

October 18, 2016

VIA ECFS

NOTICE OF EX PARTE

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW, Room TW-A325
Washington, DC 20554

Re: *Technology Transitions*, GN Docket No. 13-5; *AT&T Petition to Launch a Proceeding Concerning the TDM-to-IP Transition*, GN Docket No. 12-353; *Special Access for Price Cap Local Exchange Carriers*, WC Docket No. 05-25; *Business Data Services in an Internet Protocol Environment*, WC Docket No. 16-143; *Policies and Rules Governing Retirement of Copper Loops by Incumbent Local Exchange Carriers*, RM-11358; *AT&T Corporation Petition for Rulemaking to Reform Regulation of Incumbent Local Exchange Carrier Rates for Interstate Special Access Services*, RM-10593

Dear Ms. Dortch:

On October 14, 2016, on behalf of Granite Telecommunications, LLC (“Granite”), I spoke to Matt DelNero, Chief of the Wireline Competition Bureau, about the above-referenced proceedings. During the discussion, I stated that Granite strongly supports the Chairman’s proposal to extend the duration of the regulatory backstop for wholesale platform services adopted in the *Technology Transitions Order*¹ for four years. This change is appropriate given the absence of competition in the provision of wholesale voice services for multi-location business customers. I also stated that the Commission should retain the flexibility to extend the duration of the regulatory backstop in the event that competition in the provision of wholesale business voice services for multi-location customers does not develop in the next four years. In addition, I stated that, in the further NPRM released with the order in these proceedings, the Commission may wish to reassess the regulatory status of IP business voice service.

¹ See *Technology Transitions*, Report and Order, Order on Reconsideration, and Further Notice of Proposed Rulemaking, 30 FCC Rcd 9372, ¶ 132 (2015) (adopting an interim rule that incumbent LECs seeking Section 214 authority to discontinue a TDM-based commercial wholesale platform service that is currently used as a wholesale input by competitive carriers must provide competitive carriers with reasonably comparable access on reasonably comparable rates, terms, and conditions).

Marlene H. Dortch
October 18, 2016
Page 2

Please do not hesitate to contact me if you have any questions or concerns regarding this submission.

Respectfully submitted,

/s/ Thomas Jones
Counsel for Granite Telecommunications, LLC

cc: Matt DelNero